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**FILED**

FEB 22 2023

Clerk, U S District Court  
District Of Montana  
Missoula

**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**JUSTIN JOSE ROMO,**

**Defendant.**

**CR 23- 14 -M- DWM**

**INDICTMENT**

**POSSESSION WITH INTENT TO  
DISTRIBUTE CONTROLLED  
SUBSTANCES**

**(Count 1)**

**Title 21 U.S.C. § 841(a)(1), 18 U.S.C. § 2**

**(Penalty for Methamphetamine: Mandatory  
minimum ten years to life imprisonment,  
\$10,000,000 fine, and at least five years of  
supervised release;**

**Penalty for Fentanyl: Mandatory minimum  
five to 40 years of imprisonment, \$5,000,000  
fine, and at least four years of supervised  
release)**

	<p><b>PROHIBITED PERSON IN POSSESSION OF A FIREARM AND AMMUNITION (Count 2)</b> Title 18 U.S.C. § 922(g)(1) (Penalty: 15 years of imprisonment, \$250,000 fine, and three years of supervised release)</p> <p><b>POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING CRIME</b> Title 18 U.S.C. § 924(c)(1)(A)(i) (Count 3) (Penalty: Mandatory minimum five years to life imprisonment, consecutive to any other sentence, \$250,000 fine, and five years of supervised release)</p> <p><b>FORFEITURE ALLEGATION</b> Title 21 U.S.C. §§ 853(a)(1) and (2) Title 18 U.S.C. § 924(d)</p> <p><b>TITLE 21 PENALTIES MAY BE ENHANCED FOR PRIOR DRUG-RELATED FELONY CONVICTIONS</b></p>
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**THE GRAND JURY CHARGES:**

**COUNT 1**

That beginning in March 2022, and continuing until on or about September 30, 2022, at Kalispell, in Flathead County, in the State and District of Montana, and in Humboldt County, in the State and District of Nevada, the defendant, JUSTIN JOSE ROMO, knowingly and unlawfully possessed with the intent to distribute, 50 grams or more of actual methamphetamine, a Schedule II controlled substance, and 40 grams or more of a substance containing a detectable amount of N-phenyl-N-[1-

(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as “fentanyl,” a Schedule II controlled substance, and did aid and abet the same, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

#### COUNT 2

That on or about July 7, 2022, at Kalispell, in Flathead County, in the State and District of Montana, the defendant, JUSTIN JOSE ROMO, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate commerce, a firearm and ammunition, in violation of 18 U.S.C. § 922(g)(1).

#### COUNT 3

That on or about and between July 7, 2022, at Kalispell, in Flathead County, in the State and District of Montana, the defendant, JUSTIN JOSE ROMO, did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely possession with intent to distribute controlled substances, as alleged in count 1 above, in violation of 18 U.S.C. § 924(c)(1)(A)(i).

#### FORFEITURE ALLEGATION

Upon conviction of the offense set forth in count 1 of this indictment, the defendant, JUSTIN JOSE ROMO, shall forfeit, pursuant to 21 U.S.C. §§ 853(a)(1)

and (2): (1) any property constituting and derived from any proceeds obtained, directly and indirectly, as a result of the commission of said offense; and (2) any property used and intended to be used, in any manner and part, to commit, and facilitate the commission of, said offense.

Upon conviction of an offense set forth in counts 2 or 3 of this indictment, the defendant, JUSTIN JOSE ROMO, shall forfeit, pursuant to 18 U.S.C. § 924(d), any firearms and ammunition involved in any knowing violation of said offense.

A TRUE BILL.

Foreperson signature redacted. Original document  
filed under seal.

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FOREPERSON

For   
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JESSE A. LASLOVICH  
United States Attorney

  
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CYNDEE L. PETERSON  
Criminal Chief Assistant U.S. Attorney